

Privacy Policy

EU General Data Protection Regulation (2016/679), Articles 13 and 14

Processing of personal data in Business Helsinki's customer and partner relationships

Data controller

City of Helsinki/City Board

Purposes of processing

The purpose of processing personal data in the register is related to the operations of the City of Helsinki Executive Office's Economic Development Department (marketing name: Business Helsinki) in connection with the City's economic, innovation and competitiveness policies, as well as the promotion of entrepreneurship, tourism and destination services, and employment and immigration matters.

Among other things, the processing activities include the following:

Services for start-ups and existing businesses, public and third sector services, management of customer and business/partner relationships, organising events and entrepreneur network activities:

• marketing, events and communications

- processing of various grants and subsidies (including support for businesses and youth summer entrepreneurship), as well as reporting
- tourist information
- contract-based network collaboration in tourism and other target industries
- identifying changes in companies' workforce needs.

In the Immigration Unit (MAU), personal data is processed for the following purposes:

- promoting integration and organising MAU's employer services
- documentation of planning and implementation
- providing information on the progress and evaluation of the service process to the customer and the service provider.
- MAU Integration support services: Conducting interviews, providing advice and recording customer contacts in the service coordination.
- MAU International talent services: Conducting interviews, providing advice and recording customer contacts in the service coordination.

Legal basis of processing

When providing services for start-up companies, managing customer and business/partner relationships, organising events, coordinating entrepreneur networks and offering tourism advice, personal data is processed under:

 Article 6(1)(e) of the EU General Data Protection Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. When targeting marketing and communications to private individuals, personal data is processed under:

 Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has consented to the processing of their personal data for one or more specific purposes.

When targeting marketing and communications to communities, personal data is processed under:

 Article 6(1)(e) of the EU General Data Protection Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This concerns information describing a person's position, duties and performance in a public organisation, business, non-profit or similar activity. The purpose of processing is in the public interest, and the processing is proportionate to the legitimate aim pursued. Therefore, the processing is lawful under Section 4 of the Data Protection Act.

When granting statutory financial support to companies or entrepreneurs, personal data is processed under:

 Article 6(1)(c) of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject. When carrying out tourism network activities for companies or entrepreneurs, personal data is processed under:

 Article 6(1)(b) of the EU General Data Protection Regulation: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

When providing immigration services to companies or individuals, personal data is processed under:

 Article 6(1)(e) of the EU General Data Protection Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This concerns, among other things, measures that promote settlement, specifically supporting the integration of immigrants moving to the municipality for work or study purposes, outside the scope of the municipality's official integration programme (Integration Act 681/2023).

Key legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Local Government Act (410/2015)
- Act on Public Employment and Business Service (28 December 2012/916)
- Integration Act 681/2023

Which personal data do we process?

When the City provides services for start-up companies, manages customer and company/partner relationships, organises events, operates entrepreneur networks or surveys companies' labour needs, the following personal data is processed:

- the data subject's name, contact details (including email address, phone number and social media contact information), gender, date of birth, language, customer service language and dietary information
- a sole trader's business name and Business ID
- information on education and skills
- business plans, financing plans and similar plans that the customer has provided during customer advice sessions
- information related to customer, partner and advice meetings, and event activities
- title, photograph, event participation, meetings held during events, interests, role in events, presentation text, schedule description and IP address
- financial information concerning a sole trader that they have provided during customer advice sessions
- customer feedback received through business advice services.

When specific personal data related to an individual's diet is processed in the provision of a service, the processing is lawful under Article 9(2)(a) of the EU General Data Protection Regulation, according to which the data subject has given explicit consent to the processing of that personal data for one or more specified purposes.

When the City carries out marketing and communications, the personal data processed includes:

• the data subject's name, contact details (including email address and phone number) and customer service language.

When the City processes various grants and subsidies (including support for businesses and youth summer entrepreneurship), and carries out reporting, the personal data processed includes:

- the data subject's name, contact details (including email address and phone number) and age
- information on education and skills
- data related to employment status is processed in the summer entrepreneurship programme for young people.

When the City provides tourism information services, the personal data processed includes:

- the data subject's name, contact details (including email address and phone number)
- chat discussion data, IP address, blocked chat participants.

When the City provides immigration services, the personal data processed includes:

- the customer's basic information (last name, first names, street address, post code, city, country of origin, home municipality, customer service language, date of birth, gender, nationality, previous home municipality)
- information related to the provision of settlement services (language skills, previous educational history, profession, work experience, special

skills, employment status, wishes and goals, competencies, guidance for service needs assessment, settlement support plan).

How do we collect personal data?

Personal data is mainly collected from the data subjects themselves.

In the case of an employee of a company, association, organisation or other entity, personal data may also be collected from public data sources (e.g. YTJ, PRH) through API implementations or by using viewing access.

Personal data may also be collected from organisations' public websites, through various social media services or by purchasing address lists from commercial operators.

To whom do we disclose personal data?

Regular external disclosures:

• no regular external disclosures.

Disclosures within the City:

• no regular internal disclosures.

Processors of personal data

The City may outsource the processing (in order to provide its services) of your personal data to an external system supplier or service provider based on a separate agreement. In that case, the personal data is processed on behalf of the City and to fulfil a purpose determined by the City. The City remains the controller of your personal data. The City and the service provider are jointly responsible for the appropriate processing of your personal data.

Is personal data transferred outside the EU or EEA?

The City uses a subcontractor for data processing in the customer relationship management system, and data may be transferred outside the EU or EEA. When transferring data outside the EU or EEA, the transfer is made using the European Commission's standard contractual clauses.

How long do we retain personal data?

Customer service processes – Services for new companies, management of customer and company/partner relationships, tourism information, network activities based on customer or contractual relationships and activities related to forecasting companies' labour needs:

• retained for the duration of the customer relationship and for five years after the relationship ends.

Marketing and communications, as well as voluntary network activities:

 Personal data is retained for the duration of its active use/consent or for a maximum of five years. The data subject can request the deletion of their data at any time, and it will be removed from the register.

Processing of various grants and subsidies (including support for businesses and youth summer entrepreneurship), as well as reporting:

• The retention period for financial documents is 10 years.

Immigrant services

- Personal data is retained for the duration of its active use or for a maximum of five years. The data subject can request the deletion of their data at any time, and it will be removed from the register.
- Projects and project-related data are retained for 10 years.

Automated decision-making and profiling

No automated decision-making or profiling is carried out.

Rights concerning the processing of your personal data

Rights of data subjects and instructions on how to exercise them can be found from:

https://www.hel.fi/fi/paatoksenteko-ja-hallinto/tietoa-helsingista/tietosuoja-jatiedonhallinta/tietosuoja/rekisteroidyn-oikeudet-ja-niiden-toteuttaminen

Right of access, Article 15

You have the right to know what personal data is processed about you and what data is stored about you. The City of Helsinki will provide the information without undue delay, at the latest within one month of receiving the request. If necessary, this period may be extended by a maximum of two months if the request is of exceptional scope and complexity. If the time limit is extended, the city will inform the person requesting the information of this within one month of receiving the request, as well as of the reasons for the delay.

If the city refuses to carry out your request for access, it will inform you of this within one month of receiving the request. The city will also state the reasons for the refusal, unless this would jeopardize the purpose of the refusal. You

will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

Right to rectification, Article 16

You have the right to demand that the city rectify imprecise and inaccurate personal data concerning you without undue delay. In addition, you have the right to supplement incomplete information. Any incompleteness of the data will be resolved by taking into account the purpose of the processing of personal data.

If the city does not accept the person's demand for rectification, it will issue a written certificate stating the reasons the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate.

Right to erasure, right to be forgotten, Article 17

You have the right to request the erasure of your data in the following cases:

- You withdraw your consent on which the processing was based on and there is no other legal basis for the processing.
- You object to the processing of your data for purposes of direct marketing.
- You object to the processing on grounds relating to your particular situation and there are no overriding legitimate grounds for the processing.
- Your personal data has been unlawfully processed.
- Your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

• Your personal data has been collected in relation to the offer of information society services and it concerns the personal data of a minor.

If the city does not accept your request for erasure, it will issue a written certificate stating the reasons why the request was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate. The right to erasure does not exist if the processing is based on compliance with the city's statutory obligation, or it is related to the performance of a task carried out in public interest or the exercise of public authority vested in the city.

Right to restriction of processing, Article 18

In certain situations, you may have the right to request that the processing of your personal data is restricted until your data has been duly checked and corrected or supplemented. Such situations include when you deny accuracy of your data, in which case the processing of your data is restricted for the time the city checks its accuracy.

Right to data portability, Article 20

You have the right to transfer your personal data from one controller to another if you have provided the controller with your personal data by yourself, and the processing of the data is based on consent or a contract, and the processing is carried out automatically.

This right does not apply to processing that is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in the city.

Right to object, Article 21

You have the right to object at any time on grounds relating to your personal situation to the processing of your personal data where the processing is based on the performance of a task carried out in the public interest or in the exercise of an official authority vested in the city. In this case, the data may be further processed only if there is a substantial and justified reason for the processing that can be demonstrated by the city. The processing may also continue if the processing is necessary for the establishment, exercise or defense of legal claims.

Right to withdraw consent, Article 7

When the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. When the city asks you to give the city your consent, you are informed of this right at the same time.

The withdrawal of consent does not affect the lawfulness of processing done prior to the withdrawal of consent.

Right to lodge a complaint with an authority, Article 77

You have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the EU General Data Protection Regulation. In Finland, this supervisory authority is the Data Protection Ombudsman. In addition, you have the right to exercise other administrative and judicial remedies.

Office of the Data Protection Ombudsman Visiting address: Lintulahdenkuja 4 Postal address: PL 800, 00531 Helsinki Email: tietosuoja@om.fi Switchboard: 029 56 66700

Contact persons for this privacy policy:

Team Manager, City Executive Office/Economic Development Department/Business Services/Business Advice Services

Tourism Manager, City Executive Office/Economic Development Department/Tourism and Attraction Services

Person responsible for this privacy policy:

City Executive Office/Economic Development Department/Business Services Unit/Director, Business Services

In accordance with Section 182 of the decision of the City Board on the responsibilities and tasks related to record-keeping in the City Executive Office, dated 7 March 2022, the person responsible for the register is the head of the unit, appointed by the Director of Economic Development.

Contact details

City of Helsinki, Register Office, PO Box 10 (Pohjoisesplanadi 11-13), 00099

City of Helsinki

Data Protection Officer's contact details

Data Protection Officer of the City of Helsinki <u>tietosuoja@hel.fi</u> +358 9 310 1691 (switchboard) This privacy notice was last updated on 8 April 2025